



CITY OF HOUSTON

Sylvester Turner

Mayor

P.O. Box 1562
Houston, Texas 77251-1562

Telephone – Dial 311
www.houstontx.gov

January 13, 2020

Samantha Deshommes
Chief, Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW, Mailstop #2140
Washington, D.C. 20529-2140

DHS Docket No. USCIS-2019-0011; 84 F.R. 62374

Re: Notice of Proposed Rulemaking and Comments on Asylum Application, Interview, and Employment Authorization for Applicants

Dear Chief Deshommes:

The City of Houston is opposed to the Department of Homeland Security's Notice of Proposed Rulemaking DHS Docket No. DHS-2019-0011, 84 F.R. 62374, issued November 14, 2019. I request that you include this letter as part of public comments concerning the proposed rule.

As the most diverse city in the United States, the proposed rule stands against everything we represent as a welcoming city. Whether it is for economic reasons or to escape persecution in their homeland, people come to Houston to pursue their dreams and seek a better life for themselves and their families. Regardless of where they are from, we value the contributions our residents make to our city. Our robust immigrant communities are one of the reasons Houston has become a global destination for those who seek to visit, do business, or make Houston their home.

Our economic prosperity also depends on our foreign-born residents. According to a report issued in 2019 by the New American Economy, they contributed more than 26 percent of the Houston metro area's GDP and comprised 30.6 percent of our labor force. They fill labor shortages that our key industries rely on to succeed, their work benefits both our foreign and our native-born residents.^[1]

Aside from the negative economic impact of the proposed rule on our city, it is also in opposition to our Texas-friendly values, as it will make it harder for people to get asylum protection in the United States when they have a legitimate need for it. Asylum seekers are already burdened with

a 150-day wait-period to apply for a work permit; and should the rule go into effect, they will have to wait 365 days to apply for work permits. This will make it difficult for them to support themselves and their families and deprive local employers of a critical and hard-working labor force. The proposed changes will add unnecessary burdens to families, who have a right to both feel safe and secure in their neighborhoods and also be able to earn a living without unnecessary and burdensome policies.

Houston has a long and proud history of being a welcoming city to immigrants, refugees and asylum seekers, and our city has thrived and prospered because of them. The proposed rule would harm the Houston economy and undermine the stability and well-being of our community. I urge the Department of Homeland Security to not implement the proposed rule change, and to instead retain the current processing regulations for work authorization and asylum.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Sylvester Turner', written over a horizontal line.

Sylvester Turner
Mayor

^[1] New Data Shows Houston's Immigrants Generate More than a Quarter of the Area's GDP New American Economy, March 7, 2019. <<<https://www.newamericaneconomy.org/press-release/new-data-shows-houstons-immigrants-generate-more-than-a-quarter-of-the-areas-gdp/>>>